

APPLICATION DENIED

The Court has carefully reviewed the Presentence Report ("PSR") in this case, which contains substantial relevant information about defendant's personal and family background, physical condition, substance abuse history, educational and vocational history, and employment record. The PSR also states that defendant "disclaimed any history of mental or emotional health issues." The Court has also carefully reviewed defense counsel's thorough sentencing submissions, which contain, among other things, substantial relevant details about defendant's personal background and history, his experience while in prison during the pandemic, and a letter from defendant himself. Under the circumstances, there is no need for additional information from a mitigation specialist. Sentencing will proceed as scheduled on 3/18/2021 at 2:30 p.m.

THEODORE S.
RICHARD D. W.

SO ORDERED:

The Honorable
United States
300 Quarantine
White Plains



Vincent L. Briccetti, U.S.D.J. 3/16/2021

Re: *United States v. Chester Brown*
18 Cr. 818 (VB)

Dear Judge Briccetti:

Chester Brown hereby applies for the appointment of a mitigation specialist to prepare a report in aid of sentencing and, consequently, an adjournment of the sentencing proceedings currently scheduled for March 18, 2021 for approximately 120 days to allow sufficient time for a report to be created and considered.

Mr. Brown is detained at the Orange County Jail, but he is facing a ten-year mandatory minimum with an advisory sentencing range of 204 to 225 months' imprisonment. He will not be prejudiced by the delay and hopes the report will help persuade the Court to impose a below-guidelines range. He recently learned that the Court has the power to appoint a mitigation specialist. Because this development just took place, I have not begun to search for such an expert, but if the Court is inclined to adjourn the sentencing, counsel will make a further application for the appointment of a specific person pursuant to the Criminal Justice Act.

Very truly yours,

/s/

RICHARD D. WILLSTATTER

